

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JOHN NG,

Plaintiff,

--against--

Docket #: 08 CV 2045 (DLC)

**PLAINTIFF'S INITIAL
DISCLOSURES**

**THE CITY OF NEW YORK, NEW YORK
CITY HEALTH AND HOSPITALS
CORPORATION, HARLEM HOSPITAL
CENTER AND DETECTIVE ALEXANDER
BROWN, SHIELD # 3009, IN HIS
INDIVIDUAL CAPACITY AND AS A
POLICE OFFICER FOR THE NEW YORK
CITY HEALTH AND HOSPITAL
CORPORATION,**

Defendants.

-----X

Plaintiff, by his attorneys, Law Office of Pat Bonanno & Associates, P.C., by Thomas M. Gambino, Esq., as and for his initial disclosures pursuant to Rule 26(a)(1), provide as follows:

A. Witnesses

John Ng, 620 West 239 Street, Bronx, NY 10463.

Dr. Jasmine Pottinger, 210 East 118th Street, Apt. 201, New York, NY 10035.

The above witnesses will testify as to factual allegations contained in Plaintiff's Complaint.

B. Documents

Plaintiff is not presently in possession of any documents.

C. Damages

Damages are calculated as follows:

Without the assistance of an actuary, Plaintiff can only estimate his damages. Damages are based upon his loss of career development, loss of reputation and standing in the community and Constitutional violations and tortious misconduct, plus punitive damages and attorney fees.

D. Insurance

None.

Plaintiff reserves the right to amend these responses as may be necessary and appropriate.

Dated: Poughkeepsie, New York
August 7, 2008

Respectfully submitted
Law Office of Pat Bonanno & Associates, P.C.
222 Church Street
Poughkeepsie, NY 12601
(845) 473-0427

By: _____/s Thomas M. Gambino_____
THOMAS M. GAMBINO, Esq. (TG6332)
Of Counsel

AFFIRMATION OF SERVICE BY MAIL

I, Thomas M. Gambino, an attorney duly admitted to practice before the courts of this State, affirms under penalty of perjury that, on August 7, 2008, I served a copy of the within Initial Disclosures by depositing the same, enclosed in a first class postage paid properly addressed wrapper in an official depository under the exclusive care of the United States Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

Corporation Counsel of the City of New York
Attn: Johana V. Castro, Esq.
100 Church Street
New York, NY 10007

Dated: Poughkeepsie, New York
August 7, 2008

_____/s Thomas M. Gambino_____
THOMAS M. GAMBINO, Esq.(TG6332)